



California Regional Water Quality Control Board

Los Angeles Region



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January 23, 2002

Mr. Michael Farley
Jervis B. Webb Company
34375 West Twelve Mile Road
Farmington Hills, MI 48331-5624

NO FURTHER ACTION FOR SOIL ASSESSMENT AND CLEANUP FOR INDUSTRIAL WASTE CLARIFIER, SUMPS T1 AND T2 AND ANODIZING AREA AT JERVIS B. WEBB COMPANY - 5030 FIRESTONE BOULEVARD AND 9301 RAYO AVENUE, SOUTH GATE (SLIC NO. 744)

Dear Mr. Farley:

Thank you for the Closure Report, dated October 4, 2001, and subsequent Soil Removal Activities Report dated December 17, 2001, for the site, prepared by IT Corporation. Multiple Phases of soil and groundwater investigation and remedial activities were conducted at the site to characterize and cleanup the sources of total recoverable petroleum hydrocarbons (TRPH), volatile organic compounds (VOCs) and metals contamination. The sources of contamination included the industrial waste clarifier, sumps T1 and T2, and anodizing areas. Soil analytical testing results indicated non-detect to 270,000 µg/Kg of trichloroethylene (TCE), non-detect to 140,000 µg/Kg of perchloroethylene (PCE), non-detect to 52 µg/Kg of 1,1-dichloroethane (1,1-DCA), non-detect to 300 µg/Kg of 1,1,1-trichloroethane (1,1,1-TCA), non-detect to 280 mg/Kg of TRPH, non-detect to 5 µg/Kg of benzene, non-detect to 12 µg/Kg of toluene, non-detect to 140 µg/Kg of TRPH C5-C10, non-detect to 6,900 mg/Kg of TRPH C10-C20, non-detect to 29,000 mg/Kg of TRPH C20-C30, non-detect to 360 mg/Kg of antimony, non-detect to 26 mg/Kg of arsenic, 2,700 mg/Kg of barium, non-detect to 8.3 mg/Kg of cadmium, 7,300 mg/Kg of chromium, non-detect to 0.88 mg/Kg of hexavalent chromium, non-detect to 31,000 mg/Kg of lead, and non-detect to 2.5 mg/Kg of mercury. Approximately 39 cubic yards of impacted soil were excavated from the site. A soil vapor extraction system was operated at the site. Confirmation soil analytical testing results and residual contaminant concentrations indicate a maximum of 67 µg/Kg of TCE, 39 µg/Kg of PCE, 1,800 mg/Kg of TRPH C20-C30, 16,000 mg/Kg of TRPH C20-C30, 7.9 mg/Kg of arsenic, 170 mg/Kg of Barium, 0.6 mg/Kg of cadmium, 74 mg/Kg of chromium, 0.24 mg/Kg of hexavalent chromium, 25 mg/Kg of lead, and 2.5 mg/Kg of mercury.

Groundwater is encountered at approximately 42 feet below ground surface. The groundwater beneath the site is impacted with VOCs and metals. The groundwater contamination consists of 77 µg/L of Benzene, 140 µg/L of Toluene, 240 µg/L of 1,1-DCA, 220 µg/L of 1,1-DCE, 65 µg/L of 1,2-DCA, 450 µg/L of cis 1,2-DCE, 45 µg/L of trans 1,2-DCE, 190 µg/L of PCE, 35,000 µg/L of TCE, 8.4 µg/L of MEK, 490 µg/L of Acetone, 320 µg/L of arsenic and 1,100 µg/L of molybdenum.

Based upon the information submitted, the Regional Board has no further requirements with respect to soils at the site. The residual levels of TRPH, metals, and VOCs, with the exception of minor isolated elevated concentrations, detected in the vadose zone at the site are below the site specific cleanup levels established by the Regional Board's 1996 Interim Site Assessment and Cleanup Guidebook, "Designated

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Mr. Michael Farley
Jervis B. Webb Company

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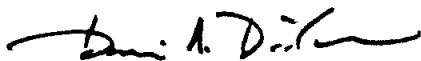
Level Methodology", date October 1986 and updated June 1989 for groundwater resource protection, and the U.S. EPA Region IX preliminary remediation goals (PRG) levels for human health protection. The residual elevated concentrations of TRPH, metals and VOCs are localized, of limited mass and the planned use of the site as a paved development will minimize future groundwater impacts.

This determination of no further action for soil only, is based on available information and the provision that the information provided to this agency was accurate and representative of site conditions. Please contact the Regional Board immediately, if additional soil contamination is discovered during any future development activities.

However, based on the existing groundwater contamination on-site, we are requiring groundwater monitoring for all wells (MW-1 to MW-5). In addition, the Regional Board may require additional groundwater assessment pending our review of any off-site soil and groundwater assessment data and/or potential sources. We are also providing you the opportunity to present any additional data that may suggest that there is other contributing groundwater contaminant sources off-site.

Please contact Dr. Rebecca Chou at (213) 576-6733 or Mr. Steven Hariri at (213) 576-6745, if you have any questions regarding this matter.

Sincerely,



Dennis A. Dickerson
Executive Officer

cc: Robert Sams, Legal Council, State Water Resources Control Board
Gene Lucero, Latham & Watkins
Gary Cronk, IT Corporation
Mr. Jeff Palmer and Ms. Nikki Reagan, Reliable Steel

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